

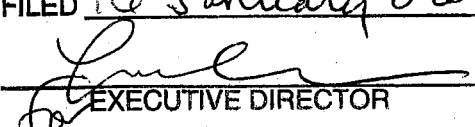
For Public

**BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA**

* * * * *

**In The Matter of Charges and
Complaint Against
DJORDJE V. HRISTIC, M.D.,
Respondent.**

NO. Case No. 08-12486-1

FILED 16 January 2008

EXECUTIVE DIRECTOR

COMPLAINT

The Investigative Committee of the Board of Medical Examiners of the state of Nevada, composed of Charles N. Held, M.D., Chairman, Cindy Lamerson, M.D. Member, and Jean Stoess, M.A., Member, by and through Lyn E. Beggs, Deputy General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Djordje V. Hristic, M.D., hereinafter referred to as "Respondent," has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Respondent is currently licensed in active status to practice medicine in the state of Nevada, and at all times alleged herein, was so licensed by the Nevada State Board of Medical Examiners, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Patient A was a seventy-four year old male at the time of the matter in question. His true identity is not disclosed to protect his privacy, but his identity is disclosed in the Patient Designation served on Respondent along with a copy of this Complaint.

3. Patient A presented to the emergency room at Valley Hospital in Las Vegas, Nevada in the early morning hours of February 10, 2002.

4. While in the emergency room, a non-contract CT scan was performed, which was read by Respondent, indicating a tiny right subdural hematoma in the parietal region with no significant mass effect or midline shift with a thickness of less than 1 cm.

1 5. A neurosurgical consult was performed by Dr. Michael Seiff who recommended that the
2 CT scan be repeated in twenty-four hours and that the patient be discharged after that time if he
3 remained clinically stable.

4 6. Patient A was admitted to the hospital to the care of Dr. Amy Tseng who performed a
5 physical. Due to Patient A's history of Alzheimer's and mental status at the time of admission, a
6 history was obtained from Patient A's wife who reported that he suffered from dementia, which
7 included episodes of physical violence for which he had recently been started on Zyprexa.

8 7. On February 11, 2002, a neurology consult was performed by Dr. Gobinder Chopra who
9 assessed Patient A as having possible Parkinson's disease, dementia, associated with possible drug-
10 induced Parkinsonism and ordered an MRI to rule out small vessel ischemic disease, discontinued
11 Zyprexa and suggested starting the patient on anti-Parkinson's medications.

12 8. Dr. Chopra again saw Patient A on February 12, 2002, and noted that he was more
13 awake and conversive and started aspirin for stroke prevention.

14 9. Dr. Amy Tseng subsequently ordered Lovenox for full anticoagulation.

15 10. The MRI, previously ordered by Dr. Chopra was performed on February 13, 2002, and
16 was read also by Respondent.

17 11. In reading the MRI, Respondent found a very small right subdural collection with mild
18 dural enhancement throughout that extended over the convexity of the right cerebral hemisphere but did
19 not exceed more than one centimeter in thickness. He also noted no midline shift of mass effect.

20 12. Respondent indicated in his impression in his radiology report a small subdural
21 collection, most consistent with a resolving subdural hematoma and senescent changes with small, old
22 infarct in the right corona radiata. However, the MRI actually indicated an enlarging subdural
23 hematoma with new mass effect.

24 13. Patient A's condition began to decline on February 15, 2002 and he was eventually
25 transferred to the ICU where he was intubated and a Code 99 was called.

26 14. A CT scan was completed on February 16, 2002, which was read by a radiologist other
27 than Respondent. The radiology reported indicated a worsening in the appearance of the head in

28 ///

1 comparison to the CT scan completed on February 10, 2002, with a very large extra-axial blood
2 collection.

3 15. A neurosurgical consult was performed, and the patient was ultimately found to be brain
4 dead and expired.

5 **Count I**

6 16. Nevada Administrative Code Section 630.040 defines malpractice as the failure of a
7 physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under
8 similar circumstances.

9 17. Respondent failed to use the reasonable care, skill, or knowledge ordinarily used under
10 similar circumstances when he failed to recognize the enlarging subdural hematoma with new mass
11 effect in his interpretation of the February 13, 2002, MRI performed on Patient A and instead reported
12 the a resolving subdural hematoma.

13 18. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
14 Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

15 **WHEREFORE**, the Investigative Committee prays:

16 1. That the Nevada State Board of Medical Examiners fix a time and place for a formal
17 hearing;

18 2. That the Nevada State Board of Medical Examiners give respondent notice of the
19 charges herein against him, the time and place set for the hearing, and the possible sanctions against
20 him;

21 3. That the Nevada State Board of Medical Examiners determine what sanctions it
22 determines to impose for the violation or violations committed by Respondent;

23 4. That the Nevada State Board of Medical Examiners make, issue and serve on
24 Respondent its findings of facts, conclusions of law and order, in writing, that includes the sanctions
25 imposed; and

26 ///


27 ///

28 ///

1 5. That the Nevada State Board of Medical Examiners take such other and further action as
2 may be just and proper in these premises.

3
4 DATED this 16th day of January, 2008.

5 INVESTIGATIVE COMMITTEE OF
6 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

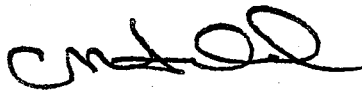
7
8 By: 
9 Lyn E. Beggs
10 Attorney for the Investigative Committee of the Nevada
11 State Board of Medical Examiners

1 **VERIFICATION**

2 STATE OF NEVADA)
3 : ss.
4 COUNTY OF DOUGLAS)

5 CHARLES N. HELD, M.D., having been duly sworn, hereby deposes and states under penalty
6 of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical
7 Examiners that authorized the complaint against the Respondent herein; that he has read the foregoing
8 Complaint; and that based upon information discovered in the course of the investigation into a
9 complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint
10 against Respondent are true, accurate, and correct.

11 DATED this 16th day of January, 2008.
12

13 
14

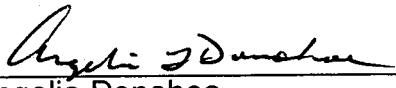
15 _____
16 CHARLES N. HELD, M.D.
17
18
19
20
21
22
23
24
25
26
27
28

1 **CERTIFICATE OF MAILING**

2 I hereby certify that I am employed by Nevada State Board of Medical Examiners and
3 that on the 16th day of January 2008, I served a file copy of the COMPLAINT, NOTICE OF
4 PRE-HEARING CONFERENCE & HEARING and PATIENT DESIGNATION, along with
5 appointment letter, by mailing via USPS certified return receipt mail to the following:

6 Djordje V. Hristic, M.D.
7 6649 Tara Avenue
8 Las Vegas, NV 89146

9 Dated this 16th day of January 2008.

10
11 
12 _____
13 Angelia Donohoe
14 Legal Assistant
15
16
17
18
19
20
21
22
23
24
25
26
27
28